UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

EC-2
970295

Ref: 8EPR-EP

MAR 27 1997

VIA FACSIMILE AND MAIL

Alan Pierson. Director
Bureau of Land Management
Wyoming State Office
P. O. Box 1828
Cheyenne, WY 82003-1828

Re: Comments on Jonah II FEIS

Dear Mr. Pierson:

We appreciate the opportunity to review and comment on the final Environmental impact Statement (FEIS) for the Jonah II Natural Gas Project located in southern Sublette County, WY. We would like to thank BLM for your additional work in developing this FEIS and especially BLM's participation in the series of meetings held to resolve the problems identified in EPA's review of the draft EIS.

A number of improvements have been made to the EIS to expand the alternatives and possible mitigation measures, including field development strategies and compression scenarios, that could prevent potential adverse impact to the air quality and aquatic ecosystem in the Bridger-Teton Wilderness area from the Jonah II project. We understand that the Record of Decision (ROD) will define the actual project approval parameters. EPA anticipates that the ROD will incorporate all measures available to avoid or minimize the potential adverse impacts from Jonah II as projected in the FEIS. Without appropriate mitigation measures defined in the ROD, there is a potential for increased visibility and aquatic ecosystem degradation to the B-T Wilderness from emissions associated with this gas well development project.

The cumulative impacts analysis for air quality, while not including projected emissions from the Continental Divide and Ultra Petroleum projects, and excluding Jonah II projected emissions, indicates there could be as many as

18 days exceeding the limit of acceptable change set by the United States Department of Agriculture-Forest Service for the Bridger-Teton Wilderness. There are apparently multiple emission sources within the Pinedale Resource Management Plan (RMP) area and from adjacent RMP areas that are a potential threat to the visibility and aquatic ecosystems of the Bridger-Teton Wilderness.

It is EPA's opinion that the most appropriate management vehicle to address the full range of cumulative impacts is a broad scale programmatic EIS based on location of sensitive receptor areas and emission sources. The intent of preparing such a programmatic EIS would be to fully analyze the cumulative impacts of oil and gas development on a basin-wide scale to insure consistent analysis and full public disclosure of projected impacts and define effective mitigation measures. This programmatic EIS should address the full range of environmental receptors including air quality, water quality, flora, fauna, geologic, archaeologic, and cultural resources.

EPA remains concerned that the FEIS does not include projected emissions from known gas development activities such as those occurring north of the Jonah II project area (e.g. Ultra Petroleum, et. al.) and the Continental Divide project in the reasonable foreseeable development (RFD) scenario. Without fully disclosing reasonable foreseeable development and the associate impacts, the possible decision on the Jonah II project could be made without knowledge of the potential adverse impact on adjacent sensitive receptor areas. This is especially true in light of BLM's continued approval of exploratory wells without consideration of the air quality impacts identified in the Jonah II analysis. Since the Jonah II FEIS already projects potential visibility degradation, a finding of no significant impact associated with Ultra activities is inconsistent.

We note that BLM is initiating a review of the Pinedale RMP to begin addressing RFD in the area and the need for RMP modification. EPA encourages BLM to complete this review before development of any future EISs.

The modifications and additions made in the FEIS improves the document and disclosure of potential impacts for the Jonah II project. The FEIS still predicts cumulative impact that BLM should address in the ROD and in future management planning activities including a basin-wide EIS to consider the potential impacts without artificial restrictions of Resource Management Area geopolitical boundaries.

Enclosed is a set of additional technical comments on the FEIS. EPA is available to work with BLM in explaining our comments, mitigation concerns and in developing the programmatic EIS for the Green River Basin. If you have any questions about EPA's comments or concerns, please call me or Cindy Cody at (303) 312-6228.

Sincerely,

William P. Yellowtail
Regional Administrator

Enclosure

cc: Arlan Hiner, BLM
Max Dodson, EPA
Carol Campbell, EPA
Cindy Cody, EPA
Mike Strieby, EPA
Robert Edgar, EPA
Dick Long, EPA
Larry Svoboda, EPA
Kevin Golden, EPA
Elaine Suriano, EPA HQ
Dennis Haddow, USDA-FS
Tamara Blett, USDA-FS
Erik Hauge, NPS-AQ

AIR QUALITY COMMENTS ON JONAH FIELD II NATURAL GAS PROJECT
FINAL ENVIRONMENTAL IMPACT STATEMENT

Overall, the Final EIS is an improvement over the Draft EIS. The following comments are intended to clarify the information provided in the FEIS.

General Comments:

The EIS and accompanying revised air quality technical support document are notably lacking in a quantitative analysis of existing IMPROVE data for the Bridger-Teton Wilderness area. The only mention of actual visibility levels is on page 20, first paragraph which states "Visibility in the region is very good (generally greater than 70 miles) . . . ".

Does the IMPROVE data for the previous 10 years show any correlation between visibility and ambient nitrate levels? Has the five to 10 percent of the best visibility days shown any change in the last 10 years, and do these changes suggest any trend for visibility during this 10 year period? By presenting log-normal probability frequency distributions for visibility and nitrate levels in the previous 10 years, correlations and visibility trends could be established. This data should be presented in Chapter 3, "The Affected Environment" section.

Specific Comments:

1. Page 9, Table 2.7 - Summary Comparison of Impacts. This table is very important for the EIS in that it gives the public and the decision-maker a concise summary of the differences between the alternatives.

   For the Air Quality section of the table, there are no quantifiable differences between Alternatives A, B, and the proposed action. Part of the reason for the vagueness between alternatives, is that all of the mitigation is addressed outside of the alternatives. Mitigation of air quality impacts should be addressed in alternatives so that the decision-maker can choose the type of mitigation desired.

2. Page 20, Section 3.2.1 - Air Quality. The summary of IMPROVE data for both visibility and lake acidification should be presented in this section. This data is needed to describe the "Affected Environment" and to present any impacts that are already occurring. This section states "Atmospheric deposition (acid rain) is monitored as part of the National Acid Deposition Program/National Trends Network near Pinedale, Wyoming." What trends are occurring with respect to acid rain and visibility in the Bridger-Teton Wilderness area? This information is not presented in the EIS.

3. Page 20, Section 3.2.1 - Air Quality. The first sentence of the last paragraph states "The most significant air pollutant throughout the J2PA is particulate matter." However, Table 3.2 shows that background concentrations of ozone (110 $\mu g/m^3$) are closer to the Wyoming (160 $\mu g/m^3$) and National Standard (235 $\mu g/m^3$), than the case for PM_{10} or TSP. Ozone should be identified as the most significant criteria air pollutant for locations near the Jonah II field.

4. Page 23, Section 4.1.1.1 - The Proposed Action. The first paragraph of this section states "Some impact, albeit less than that described for the PSD Class I areas, could occur within the PSD Class II Wind River Indian Reservation Roadless Area (WRIRRA)."

   This statement should be more specific for two reasons: First, the Indian Reservation has no definitive information on the impact occurring on their land, and secondly, the FEIS has replaced pages 4-4 to 4-12 of the draft EIS. Information on the cumulative NO_2 concentration at the Bridger Class 1 Wilderness Area is listed on page 4-10 in the DEIS which has been replaced by the FEIS which does not address PSD increment consumption impacts to the Bridger Wilderness Area. In other words, the FEIS section has deleted important information from the DEIS.

5. Page 24, third paragraph, first sentence. "The ISCST3 model was used to estimate the maximum 24-hour average pollutant impacts on visibility ... ." What is a maximum average? This sentence needs to be clarified to state that an average 24-hour pollutant concentration was used in the model.

6. Page 24, seventh paragraph - "Any predicted visibility impacts below 1.0 deciview would not be perceptible." This statement needs to be referenced to some scientifically based literature.

7. Page 25, first complete paragraph under Table 4.2a. "Thus, as development occurs, additional site-specific air quality analyses would be performed to ensure protection of air quality resources." An additional sentence should be added stating that from past experience, WDEQ-AQD is unlikely to require a "cumulative air quality impacts analysis" since these oil and gas sources are considered to be minor sources.

8. Page 29, third paragraph. "... the appropriate level of control would be determined and required by the WDEQ-AQD during the preconstruction permit process." For compliance with NEPA regulations, BLM has a responsibility to address mitigation even if the mitigation is outside the regulatory authority of BLM. BLM should acknowledge WDEQ's regulatory authority, but BLM should also recommend mitigation to reduce environmental impacts.

9. Page 30, listing of control measures. EPA is pleased to see this listing of control measures, and the statement that some Operators are currently using natural gas compressors with emission rates significantly less than 2.0 g/hp-hr. These control measures should be incorporated into the proposed alternatives as ways of mitigating impacts. Also, nonselective catalytic reduction should be recognized as less expensive with better NOx control efficiency when compared to lean combustion technology.

10. Page 31, first non-bullet paragraph. "Again, ..., the appropriate level of control would be determined and required by the WDEQ ...". An additional sentence shouuld be added stating that the decision-maker will make recommendations on the level of NOx emissions that BLM desires in the ROD.

11. Page 36, third bullet. "All wells permitted before January 1996 were assumed to be operating and reflected in the 1995 Interagency Monitoring of Protected Visual Environments (IMPROVE) background visibility monitoring data." See General Comment #1. What trends in visibility have occurred in the last 10 years for the Bridger-Teton?

12. Page 37, third paragraph. "At the time of a preconstruction air quality permit application, WDEQ-AQD may require a much more detailed PSD increment consumption analysis." A sentence should be added stating that in the past, WDEQ has never required a detailed PSD increment consumption analysis for oil and gas operations, and that they are unlikely to require one in the future.

13. Page 39, third paragraph, first sentence. "As described previously, the BLM assessed potential direct, indirect, and cumulative air quality impacts from the Proposed Action ... in addition to the existing air quality (or background) conditions, ...". This sentence is not entirely correct. The characterization of the background visibility in the Bridger-Teton is not adequately addressed. The only mention about visibility in this EIS is that visibility is "generally greater than 70 miles".

14. Page 40, last bullet. "All wells permitted before January 1996 were assumed to be operating and reflected in the 1995 IMPROVE background visibility monitoring data." How have these past operations affected visibility in the Bridger-Teton?

15. Page G-11, right-hand column. "NOx emissions from these projects were estimated using the "less conservative compression emissions scenario" as defined in the Moxa Arch and Fontenelle EIS' Air Quality Technical Support Document ... ." Please give an example of how emissions were reduced from the conservative to the less conservative scenario.

16. Page G-12, Note at bottom of Table G-2.6. "Texas Gulf Soda Ash, Inc. Emissions were erroneously included in Table 2.6 of the August 1997 Jonah Field II Air Quality Technical Support Document (TRC 1997a)." From Table 2.6, the Texas Gulf Trona facility is permitted to emit 654 tons/yr of SO_2. Again, the IMPROVE site data was not sufficiently analyzed to determine what impacts sources permitted prior to January 1996 would have in the Bridger-Teton Wilderness Area.

17. Page G-29, Table G.5.7. Recommend that the Unit Risk Factor for Formaldehyde be checked. 1.3×10^{-1} is too high.

18. Page 7-65. Comment Response 1. The Wyoming visibility SIP states its purpose to be "assures reasonable progress towards the national goal of preventing future, and remedying existing, visibility impairment in Class 1 areas." The Jonah II FEIS does predict visibility impairment in the Bridger-Teton Wilderness Area, and therefore, mitigation needs to be addressed in the EIS and ROD.

JONAH II NATURAL GAS PROJECT
FINAL ENVIRONMENTAL IMPACT STATEMENT

RATING: EC-2

EPA REVIEWING OFFICIAL: MIKE STRIEBY

SUMMARY OF COMMENT LETTER:

The U.S. Environmental Protection Agency, Region VIII has completed the review of the Jonah II FEIS and assigns a rating of EC-2. EPA remains concerned about the lack of full disclosure of reasonable foreseeable developments and potential impacts to visibility and aquatic ecosystems in the Bridger-Teton Wilderness. EPA expects the application of mitigation measures to reduce these projected impacts to be defined in the ROD. EPA notes the need for a programmatic EIS to address the full range of cumulative impacts from oil and gas development in the Green River Basin before further project approval.

ERP NO: ~~D~~-BLM-J70019-WY

309 COMMENT LETTER REVIEW FORM

1. ERP No. ~~F~~-BLM-J70019-WY 2. Region 8 3. Rating of this EIS EC-2

4. CEQ No. 970295 5. Letter Date 3-27-98 6. Previous EIS Rating _____

(If a No Comment Form was used, skip to item 13 and circle NC)

7. _____ What is the letter's major environmental issue? (A)ir, (C)umulative Impacts, (D)rinking Water, (E)ndangered Species (G)roundwater, Terrestrial (H)abitat, Environmental (J)ustice, A(L)ternatives, Conta(M)inated Sediment, (N)oise, (P)esticides, Water (Q)uality, (R)adiation, Purpo(S)e and Need, (T)oxics, Aq(U)atic Resources, Historic Preser(V)ation, (W)etlands, Ha(Z)ardous Waste, and (O)ther

Other is _____

8._____ What was the letter's second environmental issue, if applicable? (From above list)

9._____ What was the letter's third environmental issue, if applicable? (From above list)

10._____ What was the letter's fourth environmental issue, if applicable? (From above list)

11. Yes No Did the letter refer to any interagency meetings or other contact? (e.g., Scoping meetings, project meeting , follow up meetings or letters)

12. Yes H L Does assigned rating match the letter's language and content? (H means a higher ratings seems justified, L means a lower ratings seems justified)

13. G A P NC Overall, is the letter clear and constructive? Good, Acceptable, Poor (i.e., Are EPA's environmental issues with the project impacts explicitly stated , is the letter clear on what must be done to make the project acceptable and are our requests reasonable?) (NC circled only when a No Comment Form was used)

309 COMMENT LETTER REVIEW FORM

1. ERP No. FAFS-J65262-MT 2. Region 8 3. Rating of this EIS LO

4. CEQ No. 970146 5. Letter Date 4-30-97 6. Previous EIS Rating EC-2

(If a No Comment Form was used, skip to item 13 and circle NC)

7. O — What is the letter's major environmental issue? (A)ir, (C)umulative Impacts, (D)rinking Water, (E)ndangered Species (G)roundwater, Terrestrial (H)abitat, Environmental (J)ustice, A(L)ternatives, Conta(M)inated Sediment, (N)oise, (P)esticides, Water (Q)uality, (R)adiation, Purpo(S)e and Need, (T)oxics, Aq(U)atic Resources, Historic Preser(V)ation, (W)etlands, Ha(Z)ardous Waste, and (O)ther

Other is Not discussed

8. — What was the letter's second environmental issue, if applicable? (From above list)

9. — What was the letter's third environmental issue, if applicable? (From above list)

10. — What was the letter's fourth environmental issue, if applicable? (From above list)

11. Yes (No) Did the letter refer to any interagency meetings or other contact? (e.g., Scoping meetings, project meeting , follow up meetings or letters)

12. (Yes) H L Does assigned rating match the letter's language and content? (H means a higher ratings seems justified, L means a lower ratings seems justified)

13. G (A) P NC Overall, is the letter clear and constructive? Good, Acceptable, Poor (i.e., Are EPA's environmental issues with the project impacts explicitly stated , is the letter clear on what must be done to make the project acceptable and are our requests reasonable?) (NC circled only when a No Comment Form was used)

SUMMARY PARAGRAPH FORM

ERP NUMBER F-AFS-J65262-MT

RATING ASSIGNED TO PROJECT LO

NAME OF EPA OFFICIAL RESPONSIBLE
FOR REVIEW OF PROJECT (Principle Reviewer) Steve Potts

SUMMARY OF COMMENT LETTER

The EPA has reviewed the Basin Creek Final Environmental Impact Statement (FEIS) and Record of Decision prepared by the Kootenai National Forest. The EPA indicated that the FEIS and ROD adequately responded to Agency concerns on the DEIS. The EPA was pleased with the selection of Alternative 4 with Modifications in the ROD.

PARAGRAPH APPROVED FOR PUBLICATION

(Initials of OFA Approving Official)

NOTE: Transmit 2 copies to MIU

8MO File: 9701